

From: Sanga, Ravi <Sanga.Ravi@epa.gov>
Sent: Monday, August 31, 2020 1:24 PM
To: Mednick, Richard <Mednick.Richard@epa.gov>
Subject: FW: EPA Request for Information and Documents to A.O. Smith for East Waterway of Harbor Island Site [GK-Active.FID2155225]

These are also going to the site file. Is that ok ? I want to make sure I am not making CBI public on any of this.

From: Harrington, Arthur <ajharrin@gklaw.com>
Sent: Monday, August 31, 2020 12:51 PM
To: Mednick, Richard <Mednick.Richard@epa.gov>
Cc: Sanga, Ravi <Sanga.Ravi@epa.gov>; Duke, Karen <kduke@aosmith.com>
Subject: RE: EPA Request for Information and Documents to A.O. Smith for East Waterway of Harbor Island Site [GK-Active.FID2155225]

Dear Mr. Mednick:

As you know, our law firm represents A. O. Smith Corporation in connection with EPA's information request relating to the East Waterway Operable Unit of the Harbor Island Superfund site.

I wanted to thank you, again, for the extension granted to our client for responding to this request. It is much appreciated.

In connection with that information request, I have attached the following:

- 1. Our cover letter relating to that response, with a reference to a secure electronic site where the documents referenced in the response can be accessed:*
- 2. The written response from our client to EPA's information request: and*
- 3. The certification signed by the client.*

As referenced in the attached cover letter, we have made A. O. Smith's document production available at the secure link below:

(b) (6)

For security reasons, I will send the password to access the link by separate email.

If you would prefer that we share the documents using a zip drive (or another medium), or if you have any difficulties accessing the link, please let me know.

Of course, if you have any questions about the attached, feel free to contact me at your convenience.

Best regards,

Art

Arthur Harrington | Attorney

414.287.9414 direct
(b) (6) mobile
ajharrin@gklaw.com

833 E. Michigan Street, Suite 1800 | Milwaukee, Wisconsin 53202-5615

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From: Mednick, Richard <Mednick.Richard@epa.gov>
Sent: Thursday, July 9, 2020 3:11 PM
To: Harrington, Arthur <ajharrin@gklaw.com>
Cc: Sanga, Ravi <Sanga.Ravi@epa.gov>; Duke, Karen <kduke@aosmith.com>
Subject: RE: EPA Request for Information and Documents to A.O. Smith for East Waterway of Harbor Island Site [GK-Active.FID2155225]

[EXTERNAL] This message originated from outside your domain.

Dear Mr. Harrington,

EPA is amenable to an additional extension of time. A.O. Smith may now have until August 31, 2020, to respond to the request for information and documents.

Respectfully,

Richard

Richard Mednick
Associate Regional Counsel
Regional Judicial Officer
U.S. EPA | Region 10
1200 Sixth Avenue
Suite 155, M/S 11 C07
Seattle, WA 98101
(206) 553-1797

From: Harrington, Arthur <ajharrin@gklaw.com>
Sent: Thursday, July 9, 2020 9:27 AM
To: Mednick, Richard <Mednick.Richard@epa.gov>
Cc: Sanga, Ravi <Sanga.Ravi@epa.gov>; Duke, Karen <kduke@aosmith.com>
Subject: RE: EPA Request for Information and Documents to A.O. Smith for East Waterway of Harbor Island Site [GK-Active.FID2155225]

Dear Mr. Mednick

As you know, our firm represents A. O. Smith Corporation regarding USEPA's pending Information request directed to our client relating to the Harbor Island superfund site.

You were kind enough to provide a 60 day extension to the due date for the response to July 17, 2020. Please see below.

Recently, our client began returning to work at its Milwaukee headquarter's office after the lifting of the stay at home order here in Wisconsin and was in the process of completing the required responses. In this process this week, the client discovered a number of documents that were retrieved from an off-site storage location and that may be relevant to the information request.

Given this recent development and the work challenges created by the ongoing covid threat, we would appreciate an additional thirty day extension to complete a response to this important information request.

Thank you in advance for your consideration of this request.

Best regards,

Art

Arthur Harrington | Attorney

414.287.9414 direct

(b) (6) mobile

aiharrin@gklaw.com

833 E. Michigan Street, Suite 1800 | Milwaukee, Wisconsin 53202-5615

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From: Mednick, Richard <Mednick.Richard@epa.gov>

Sent: Friday, April 10, 2020 9:35 AM

To: Harrington, Arthur <aiharrin@gklaw.com>

Cc: Sanga, Ravi <Sanga.Ravi@epa.gov>

Subject: EPA Request for Information and Documents to A.O. Smith for East Waterway of Harbor Island Site

[EXTERNAL] This message originated from outside your domain.

Dear Arthur Harrington,

Thank you for contacting the United States Environmental Protection Agency (EPA) about the request for information and documents that the EPA issued to A.O. Smith Corporation. The request pertains to the East Waterway Operable Unit of the Harbor Island Superfund Site and was issued by the EPA pursuant to the Comprehensive Environmental Response, Compensation and Liability Act.

Due to complications related to the COVID-19 pandemic, A.O. Smith Corporation has asked that the EPA provide additional time to respond to the request. The EPA is cognizant of many of the difficulties

created by current conditions resulting from the COVID-19 pandemic and is therefore willing to provide additional time to respond to the request for information and documents. A.O. Smith Corporation now has until Friday, July 17, 2020 to provide a response.

All other aspects of the EPA request remain as stated therein.

Respectfully,

Richard Mednick
Associate Regional Counsel
Regional Judicial Officer
U.S. EPA | Region 10
1200 Sixth Avenue
Suite 155, M/S 11 C07
Seattle, WA 98101
(206) 553-1797